

McDONALD HOPKINS CO., LPA

600 Superior Avenue, East

Suite 2100

Cleveland, Ohio 44114

(216) 348-5400

Attorneys for Brush Engineered Materials Inc.

Jean R. Robertson (OH 0069252)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

DELPHI CORPORATION, et al.

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that Brush Engineered Materials ("Brush"), by and through counsel, hereby gives notice of a reclamation demand, pursuant to sections 11 U.S.C. § 362, 503, and 546 of the Bankruptcy Code and Fed. R. Bankr. P. 9019. Brush attaches as Exhibit A, and incorporates herein, a letter dated October 17, 2005, delivered to the above captioned debtors and their counsel. The value of the goods total \$324,027.51.

Respectfully submitted,



Jean R. Robertson (OH 0069252)

McDONALD HOPKINS CO., LPA

600 Superior Ave., East

Suite 2100

Cleveland, OH 44114-2653

Telephone: (216) 348-5400

Facsimile: (216) 348-5474

E-mail: jrobertson@mcdonaldhopkins.com

COUNSEL FOR BRUSH ENGINEERED
MATERIALS INC.

CERTIFICATE OF SERVICE

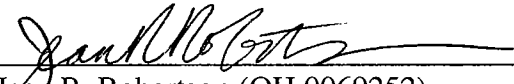
The undersigned hereby certifies that on October 21st, 2005, a true and correct copy of the Notice of Appearance and Request for Service of Papers and Notices was served via the U.S. Postal Service, first class mail upon the following parties:

John William Butler, Jr.
Skadden Arps Slate Meagher & Flom (IL)
333 West Wacker Drive
Chicago, IL 60606-1285

Thomas J. Matz
Skadden Arps Slate Meagher & Flom LLP
Four Times Square
New York, NY 10036-6522

Kayalyn A. Marafioti
Skadden Arps Slate Meagher & Flom LPP
Four Times Square
New York, NY 10036

Alicia M. Leonard
Office of the United States Trustee
Southern District of New York
33 Whitehall Street, Suite 2100
New York, NY 10004



Jean R. Robertson (OH 0069252)

EXHIBIT A

McDonald Hopkins

McDonald Hopkins Co., LPA
Attorneys at Law

600 Superior Avenue, E.	P	216.348.5400
Suite 2100	F	216.348.5474
Cleveland, Ohio 44114		mcdonaldhopkins.com

Cleveland | Columbus | West Palm Beach

Direct Dial: 216.348.5769
E-mail: jrobertson@mcdonaldhopkins.com

October 17, 2005

Via Facsimile and Federal Express

Delphi Corporation
5725 Delphi Drive
Troy, Michigan 48908-2815
Attn: Mr. John D. Sheehan
Facsimile: 248-813-2670

John Wm Butler, Jr., Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
Facsimile: 312-407-8501

Kayalyn A. Marafioti, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036
Facsimile: 212-735-2000

Re: Demand for Reclamation of Brush Engineered Materials Inc.

Dear Mr. Sheehan, Mr. Butler and Ms. Marafioti:

McDonald Hopkins Co., LPA has been retained to represent Brush Engineered Materials Inc. ("Brush") in connection with certain transactions involving Delphi Corporation ("Delphi"). We are aware that Delphi, along with 38 of its domestic affiliates (collectively, the "Debtors"), filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York on October 8, 2005, jointly administered under case number 05-44481. We are informed that Brush shipped certain Goods (defined below) to one or more of the Debtors and that the Debtors took possession of such Goods just prior to the commencement of their bankruptcy proceedings.

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October 17, 2005
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Section 2-702 of the Uniform Commercial Code and section 1302.76(B) of the Ohio Revised Code state that where a seller discovers that a buyer received goods on credit while insolvent, the seller may reclaim the goods upon written demand made within 10 days of receipt of the goods by buyer. Pursuant to section 546 of title 11 of the United States Code, such demand for reclamation may be made within 20 days of buyer's receipt of the goods if the 10-day period expires after the commencement of buyer's bankruptcy case.

Pursuant to the above-referenced statutes, demand is hereby made by Brush for the return of the goods listed on Exhibit A attached hereto and incorporated herein by reference, and any other goods that are not listed on Exhibit A that were received in the 10 days preceding the initiation of the Debtors' bankruptcy proceedings (collectively, the "Goods"). Copies of invoices and other relevant documents relating to the Goods will be sent to you under separate cover letter.

Based upon information currently available to us, we believe that the Debtors received the Goods on credit while insolvent within the 10 days preceding the initiation of the Debtors' bankruptcy proceedings, and as of this date, no part of the purchase price has been paid for such Goods. Accordingly, Brush hereby demands that all of the Goods be returned to it immediately pursuant to this reclamation demand. In addition, Brush further demands that the Goods be immediately segregated for return to Brush. Brush expressly prohibits any of the Debtors from further consuming any of the Goods or making any further sales of the Goods to others. The Goods shall be held in trust for Brush pending their return.

Please promptly confirm that the Debtors will honor Brush's reclamation demand for the Goods so that it can arrange for their immediate return.

Sincerely,



Jean R. Robertson

:amt

copy: Mr. Gary Schiavoni
Theresa Haumann, Esq.

M_H

**Brush Engineered Materials Inc.
Detail to Form of Reclamation Notice**

**Sold to :
Delphi Automotive Systems**

**Sold from:
Brush Wellman Inc.**

Invoice #	Doc Date	Amount \$	PO Number	Delivery Doc
90235004	09/29/05	\$ 19,290.96	PEDP4490034	80281903
90235006	09/29/05	\$ 5,157.08	PEDP4490044	80281954
90235137	09/29/05	\$ 22,512.60	PEDP4490044	80282079
90235163	09/30/05	\$ 13,457.64	PEDP4490042-009	80282175
90235214	09/30/05	\$ 18,913.44	PEDP4490042-009	80282130
90235686	10/06/05	\$ 17,722.46	PEDP4490042-009	80282655
90235830	10/07/05	\$ 10,494.00	PEDP4490042-009	80282949
90235915	10/07/05	\$ 6,375.60	PEDP4490042-009	80282984

**Sold to:
Delphi Electronics & Safety**

**Sold from:
Zentrix Technologies**

Invoice #	Doc Date	Amount \$	PO Number	Delivery Doc
90234935	09/28/05	\$ 26,994.60	550044638	80281883
90235845	10/04/05	\$ 26,994.59	550044638	80282940

**Sold to:
Delphi Automotive Systems**

**Sold from:
Technical Materials Inc.**

162260	09/30/05	\$109,746.77
162261	09/30/05	\$ 33,284.56
162348	10/05/05	\$ 7,976.80
162349	10/05/05	\$ 5,106.41

Total for all accounts \$324,027.51